

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|                                    |   |                  |
|------------------------------------|---|------------------|
| MELISSA JOHANSEN, as P/N/G of Z.X. | : |                  |
| 2457 N. 5 <sup>th</sup> Street     | : |                  |
| Philadelphia, PA 19133             | : |                  |
| Plaintiff                          | : |                  |
|                                    | : |                  |
| v.                                 | : | Civil Action No. |
|                                    | : |                  |
| FIRST STUDENT, INC.                | : |                  |
| 2201 E. Allegheny Avenue           | : |                  |
| Philadelphia, PA 19134             | : |                  |
| Defendant                          | : |                  |

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**NOTICE TO PLAINTIFF**

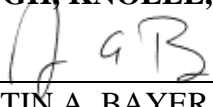
**TO:** Jared S. Zafran, Esq.  
Andrew J. Thomson, Esq.  
THE LAW OFFICE OF JARED S. ZAFRAN, LLC  
1500 Walnut Street, Suite 500  
Philadelphia, PA 19102

**PLEASE TAKE NOTICE** that Defendant First Student, Inc., has filed a Petition in the Eastern District of Pennsylvania for the removal of an action now pending in the Court of Common Pleas of Philadelphia County, entitled, Melissa Johansen, as P/N/G of Z.X. v. First Student, Inc., No. 220800781.

**FURTHER TAKE NOTICE** that petitioner, First Student, Inc., has at the same time filed with the United States District Court for the Eastern District of Pennsylvania, a copy of the Complaint served upon it, which was filed and entered in the Court of Common Pleas of Philadelphia County.

A copy of said Petition for Removal is attached to this Notice and is hereby served upon you.

**KANE, PUGH, KNOELL, TROY & KRAMER, LLP**

By:   
JUSTIN A. BAYER, ESQUIRE  
Justin A. Bayer, Esq.  
510 Swede Street  
Norristown, PA 19401  
Phone: 610-275-2000  
Fax: 610-275-2018  
Email: [jbayer@kanepugh.com](mailto:jbayer@kanepugh.com)  
PA 93546  
Attorney for Defendant, *First Student, Inc.*

Dated: August 25, 2022

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| FIRST STUDENT, INC.                | : |                  |
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| Philadelphia, PA 19134             | : |                  |
|                                    | : |                  |
| Defendant                          | : |                  |

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**DEFENDANT FIRST STUDENT, INC.'S NOTICE OF REMOVAL**

Defendant, First Student, Inc., by and through its undersigned attorneys, gives notice of the removal of the above-captioned action to this Court of a State of Civil Action pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, and in support thereof aver as follows:

1. A civil action has been brought against defendant by the plaintiff in the Court of Common Pleas of Philadelphia County at No. 220800781. A copy of that Complaint is attached hereto as Exhibit "A".

2. This is an action over which the Court has original jurisdiction pursuant to 28 U.S.C. § 1332, because it is a civil action between citizens of different states and exceeds the required amount in controversy, exclusive of interest and costs pursuant to 28 U.S.C. § 1332.

3. The State Court where the action was originally filed is located in Philadelphia County, Pennsylvania, which is embraced within this judicial district.

4. The plaintiff is, at the time of the filing of this action, a citizen of the State of Pennsylvania.

5. Defendant First Student, Inc. is a Delaware corporation with corporate headquarters located at 600 Vine Street, Suite 1400, Cincinnati, Ohio 45202.

6. In her Complaint, Plaintiff alleges minor Z.X. was sexually abused while riding a bus operated by Defendant and suffered shame, embarrassment, loss of life's pleasure, mental anguish, psychological and emotional distress, nightmares, fears and has to undergo medical and psychological treatment and rehabilitative services. Plaintiff also alleges punitive damages. See Exhibit A at ¶¶ 19-26. As such, his action is for an amount in controversy in excess of statutory jurisdictional limit of \$75,000, together with costs of this action and damages for delay.

7. The statutory requirements having been met, the state action is properly removed to United States District Court for the Eastern District of Pennsylvania.

Respectfully Submitted:

**KANE, PUGH, KNOELL, TROY & KRAMER, LLP**

By: 

JUSTIN A. BAYER, ESQUIRE

Justin A. Bayer, Esq.

510 Swede Street

Norristown, PA 19401

Phone: 610-275-2000

Fax: 610-275-2018

Email: [jbayer@kanepugh.com](mailto:jbayer@kanepugh.com)

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Attorney for Defendant, *First Student, Inc.*

Dated: August 25, 2022